

(Stipulating Parties Listed on Signature Page)

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Case No. 07-5944 SC
MDL No. 1917

This Document Relates to:

ALL INDIRECT PURCHASER ACTIONS

**STIPULATION AND ~~[PROPOSED]~~
ORDER REGARDING BRIEFING
SCHEDULE FOR PHILIPS TAIWAN
LIMITED'S AND PHILIPS DO BRASIL
LTDA.'S MOTION TO DISMISS FOR
INSUFFICIENT SERVICE OF PROCESS
AND LACK OF PERSONAL
JURISDICTION**

MDL 1917

STIPULATION AND [PROPOSED] ORDER REGARDING BRIEFING SCHEDULE FOR PHILIPS TAIWAN
LIMITED'S AND PHILIPS DO BRASIL LTDA.'S MOTION TO DISMISS FOR INSUFFICIENT SERVICE OF
PROCESS AND LACK OF PERSONAL JURISDICTION (3:07-CV-5944 SC, MDL NO. 1917).

1 WHEREAS, the Indirect Purchaser Plaintiffs (“IPPs”) filed a Fourth Consolidated Amended
 2 Complaint on January 10, 2013 in the United States District Court for the Northern District of
 3 California against Defendants Philips Taiwan Limited and Philips do Brasil Ltda.¹ (collectively the
 4 “Philips Defendants”), among others;

5 WHEREAS, the Philips Defendants intend to file a Notice of Motion and Motion to Dismiss
 6 the IPPs’ Fourth Consolidated Amended Complaint for Insufficient Service of Process and Lack of
 7 Personal Jurisdiction (the “Motion to Dismiss”) and to notice the Motion to Dismiss for a hearing on
 8 May 30, 2014;

9 WHEREAS, counsel for the Philips Defendants and counsel for the IPPs have met and
 10 conferred and have agreed upon a mutually acceptable briefing schedule relating to the Philips
 11 Defendants’ Motion to Dismiss;

12 IT IS HEREBY STIPULATED AND AGREED by and between the Philips Defendants and
 13 the IPPs that:

14 1. The Philips Defendants shall file their Notice of Motion and Motion to Dismiss the IPPs’
 15 Fourth Consolidated Amended Complaint for Insufficient Service of Process and Lack of Personal
 16 Jurisdiction (the “Motion to Dismiss”) on or before March 26, 2014;

17 2. IPPs shall submit their Opposition to the Philips Defendants’ Motion to Dismiss on or
 18 before April 14, 2014; and

19 3. The Philips Defendants shall file their Reply Brief in support of their Motion to Dismiss
 20 on or before April 24, 2014.

21
 22 * * *

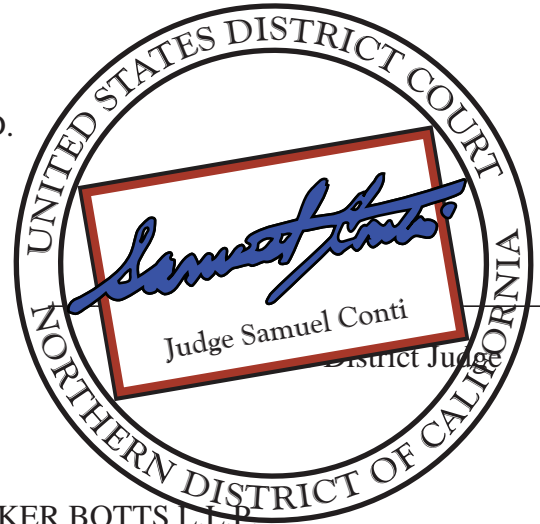
23 The undersigned parties jointly and respectfully request that the Court enter this stipulation
 24 as an order.

25
 26 ¹ The IPPs’ Fourth Consolidated Amended Complaint names Philips Electronics Industries
 27 (Taiwan), Ltd. and Philips da Amazonia Industria Ltda. as defendants. But Philips Electronics
 28 Industries (Taiwan), Ltd. has been merged into Philips Taiwan Limited and Philips da Amazonia
 Industria Electronica Ltda. has been merged into Philips do Brasil Ltda.

1 PURSUANT TO STIPULATION, IT IS SO ORDERED.

2
3 Dated: 03/27/2014
4

5
6
7 Dated: March 26, 2014



BAKER BOTTS L.L.P.

8 By: /s/ Erik T. Koons

9 Jon V. Swenson (SBN 233054)
10 1001 Page Mill Road
11 Building One, Suite 200
12 Palo Alto, CA 94304
13 Telephone: (650) 739-7500
14 Facsimile: (650) 739-7699
15 Email: jon.swenson@bakerbotts.com

16 John M. Taladay (*pro hac vice*)
17 Joseph Ostoyich (*pro hac vice*)
18 Erik T. Koons (*pro hac vice*)
19 Charles M. Malaise (*pro hac vice*)
20 **BAKER BOTTS L.L.P.**
21 1299 Pennsylvania Ave., N.W.
22 Washington, DC 20004-2400
23 Telephone: (202) 639-7700
24 Facsimile: (202) 639-7890
25 Email: john.taladay@bakerbotts.com
26 Email: joseph.ostyoich@bakerbotts.com
27 Email: erik.koons@bakerbotts.com
28 Email: charles.malaise@bakerbotts.com

*Attorneys Specially Appearing for
Defendants Philips Taiwan Limited and
Philips do Brasil Ltda.*

1 TRUMP, ALIOTO, TRUMP & PRESCOTT,
2 LLP

3 By: /s/ Mario N. Alioto

4 MARIO N. ALIOTO (SBN 56433)
5 Email: malioto@tatp.com
6 LAUREN C. CAPURRO (SBN 241151)
7 Email: lauren russell@tatp.com
8 **TRUMP, ALIOTO, TRUMP &
9 PRESCOTT, LLP**
10 2280 Union Street
11 San Francisco, CA 94123
12 Telephone: (415) 563-7200
13 Facsimile: (415) 346-0679

14
15
16
17
18
19
20
21
22
23
24
25
26
27
28 *Interim Lead Counsel for the Indirect
Purchaser Plaintiffs*